

**In the United States District Court for the Northern District of Texas  
Dallas Division**

JUL 22 2002

CLERK, U.S. DISTRICT COURT

By Deputy

(USA and)  
**Jamal Elhaj-Cehade**  
Co- plaintiff

**Vs.**  
**Educational Commission for Foreign Medical Graduates**  
**Et al entities and individuals) Defendants**

3:01-CV-01301-1

**Plaintiff's notice to the court and motion to freeze the assets of the defendants**  
**July 20, 2002**

**I-FACTS**

- 1- The defendants admitted to their obligation, and duty toward the plaintiff and their responsibilities to identify and meet the plaintiff's needs (exhibit attached)
- 2- The plaintiff cannot apply for job or apply for license until all his needs are Properly and fully identified and met by the defendants, therefore the defendants Are responsible/liable for any further failure or delay in doing so.
- 3- the liability of the defendants is for their action of omission and commission and that the defendants are liable for actions of parties other than the defendants attempting to cover for the defendants deficiencies in identifying and meeting the plaintiff's needs.
- 4- This case is Civil, therefore, pattern and conduct and evidence must be viewed as most favorably to the plaintiff side( ERCP rules of evidence) and in preponderance of evidence rather on doubt.
- 5- All the evidences submitted by the plaintiff are admissible under FRCP rule of Evidence.
- 6- the plaintiff demand for injunction against the defendants ongoing violations are just and urgent.

**II**

Comes now on this date, the plaintiff is filing his motion to freeze the assets of the defendants and reaffirming his injunction for the violations of the defendants as follow:

- 1- The plaintiff does have new information that the defendants are engaging in more questionable business deals and loans in order to hide their assets from the liability of lawsuits. Such activities have taken place at least in two cities: Philadelphia and Atlanta. Therefore the plaintiff is filing this urgent motion for freezing the assets, accounts and all properties and for whatever of value or worth that is in possession of the defendants and the plaintiff is filing a claim and his request to **hold a lien** upon such valuable items and anything of worth that is in the possession of the defendants . In the meantime, the defendants must not engage into any loan lending, borrowing, or any major purchase or debt that is more than 50 thousand US\$ **without the written** permission and approval of the **court** and the **plaintiff** until such lawsuit is resolved. And the plaintiff is requesting an **emergency hearing in which all parties present in** the courtroom before judge to discuss this matter and **the pretrial matter** where the

plaintiff excellence or advancement and etc... as the defendants are claiming to do and assuming responsibility etc( see exhibit attached where ECFMG admit to their responsibilities to identify and meet the plaintiff's NEEDS, it is in their own words)

- 8- The plaintiff will argue also the plaintiff injuries as provider, and as a consumer, and as a public( displacement, price fixing, deprivation proper access to healthcare and employment etc...) and the legality and appropriateness of the defendants activities.
- 9- The plaintiff will argue the validity of the previous court order( nullness and void) and if they are valid ( see footnote), it is the duty of the ECFMG to start identifying and meeting the plaintiff's needs. And one such need is the elimination of the plaintiff's scars created by those orders and it is the ECFMG responsibility to do so( see exhibit attached).
- 10- The plaintiff will argue on history and pattern of the ECFMG. And since the ECFMG did not attempt to identify and meet the plaintiff's needs during those proceedings, therefore those proceedings constitute **evidence** that the ECFMG is trying to destroy the plaintiff (evidence against the defendants to be used in this case). Therefore the plaintiff is filing his counterclaims against the defendants ECFMG in treble amount. And more.
- 11- Since 3:99-CV-680-D and the proceedings against UTSW( 3:98-CV-1622-P and related cases) arise out of same actions, therefore the ECFMG liabilities include both proceedings.
- 12- The case 3:99-CV-680-D is independent of this newly brought case 3:01-CV 1301-L. It is different trial for different action. The plaintiff is asking the court and will argue {if beneficial to the administration of justice and if the court sees it appropriate} should prior case( **including** proceedings against UTSW) would be restored to the docket and consolidated with this subsequent case FRCP 42-a, 28 U.S.C.A. Capacchione vs. Charlotte Mecklenburg Board of Education 179 FRD 177 WDNC 1998.
- 13- The plaintiff will argue also the long judicial hostility that exists against the plaintiff that prevented any decent and meaningful access to the court and admitted by the defendants attorney Moscowitz on April 11, 2002 at 1:03 PM admitting that all the proceeding were fabricated and Pre-arranged between the court and the defendants- the conducts is also clear and pinpoint to such facts.
- 14- The plaintiff does not wish anyone to be subjected to the hell he was subjected to, but the plaintiff is asking the judges and the attorneys to imagine living like the plaintiff as a victim abused for just one day to see if they could tolerate it.

- 15- The plaintiff will also argue the programs administered by the defendants etc..
- 16- The plaintiff may add new witnesses and evidence as they become available and necessary.
- 17- The plaintiff contacted the defendants on June 29, 2002( fax and mail) and their attorney via fax( June 29, 2002) and telephone to their attorney Mark Robert on July 5 and 17, 2002 asking them to save the plaintiff the loss of one year by identifying and meeting the plaintiff's needs before end of July 2002. However, mark Robert admitted on July 17, 2002 that his client is incapable ( unwilling or the equivalent) to identify and meet the plaintiff' needs despite their long and extensive analysis and experimentation( unconsented) upon the plaintiff. Therefore their failure or their answer are unacceptable and provide evidence against the defendants that they are only interested in getting rich without regard to any FMGs needs( claim in this litigation). And the plaintiff is asking the defendants again and in their own words to start **identify and meet** the plaintiff needs URGENT and stop the delay.
- 18- The defendants admission to their responsibilities to identify and meet the plaintiff needs, therefore, the defendants are liable for their delay in doing so, and for failure to do so, and for the consequence of action of any party( including the plaintiff) attempting to identify and meet the plaintiff's NEEDs. If the ECFMG will not identify and meet the plaintiff's needs, then such identification may be done by others and the defendants are liable for every action done.
- 19- The plaintiff will also use everything he previously mentioned

### **DEMANDS**

Wherefore premises considered, the plaintiff prays that this court approve his request and his injunction demand to stop the ONGOING violations of the defendants, and that upon trial by **jury** award the plaintiff( and the US where appropriate) all the reliefs requested and not requested as seem just, fair and appropriate

**Certificate of service and conference:** This is to certify that a true copy of the foregoing was sent via airmail and e-mail to the defendants attorney Mark Robert at his address of record at 6688 N Central expressway# 850, Dallas, Texas 75206-3913. and that the plaintiff assumes the defendants object his motion, but On July 17, 2002 the defendants attorney mark Robert admitted via telephone that his client is unable to identify and meet the plaintiff s needs and they are unwilling/unable to save the plaintiff the loss of one more year. In addition all the plaintiff statements or exhibits or attachments are true under the penalty of perjury.

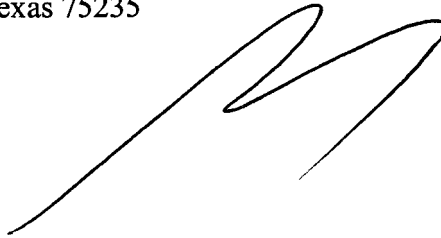
Attached is a true copy of an excerpt of ECFMG income tax file year 1999 admitting to their obligation and **responsibilities** to **identify** and **meet** the plaintiff's need and provide him with the information etc...

Respectfully submitted

Dr Jamal Elhaj\_chehade Pro-se (tentatively until his needs are identified and met before trial)

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E-mail Heyjam7@yahoo.com

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke, positioned to the right of the contact information.